

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20054

In the Matter of	)	
	)	
Amendment of Section 73.626 of the	)	GN Docket No. 16-142
Commission's Rules to Facilitate the	)	
Deployment Of Single Frequency Networks	)	
	)	
Joint Petition for Rulemaking	)	

LPTV Spectrum Rights Coalition, LLC

November 12, 2019

The LPTV Spectrum Rights Coalition, LLC (“the Coalition”) submits these comments in support of the joint petition for rulemaking filed by America’s Public Television Stations and the National Association of Broadcasters (together, “Petitioners”) proposing a minor change to the FCC’s Distributed Transmission System (“DTS”) rules that will greatly improve the utility and efficiency of television spectrum.<sup>1</sup>

The Coalition has represented both the broad spectrum rights issues of the low power television, Class-A, and the indie and civic TV translator groups throughout the country during the 2017 Incentive Auction and subsequent repacking process, and the current displacement construction permit and funding process.

The Coalition supports the updating of the full power primary station DTS rules, through the issuing of an NPRM to create rules for the use the 36 dBu contour. There is only one issue

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<sup>1</sup> See Joint Petition for Rulemaking submitted by America's Public Television Stations and the National Association of Broadcasters, GN Docket No. 16-142 (filed Oct. 3, 2019), <https://www.fcc.gov/ecfs/filing/1003981814754> (“Joint Petition”).

which is of concern to us, that the deployment of a DTS at the 36 dBu contour does NOT displace any LPTV or TV translators.

The Coalition also supports maintaining the liberal 2008 DTS rules for LPTV, so that unlimited groupings of unaffiliated and/or affiliated licensing entities may occur, over unlimited distances, without any limitation.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Mike Gravino". The signature is fluid and cursive, with the first name "Mike" written in a more stylized, looped manner.

Mike Gravino  
Director

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